



PUBLIC DISCLOSURE

March 16, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Buena Vista National Bank
Charter Number: 14479

1309 Swanwick St
Chester, IL 62233

Office of the Comptroller of the Currency
500 North Broadway, Suite 1700
St. Louis, MO 63102

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution's CRA Rating: This institution is rated **Satisfactory**.

The Lending Test is rated: Satisfactory.

The Lending Test rating is based on Buena Vista National Bank's (BVNB or bank) performance in the state of Illinois.

The major factors that support this rating include:

- The bank's loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and level of local competition.
- A majority of the bank's loans are originated inside its assessment areas (AAs).
- The bank's distribution of loans across geographies of different income levels is excellent throughout its Decatur MSA AA.
- The bank's distribution of loans to individuals of different income levels and businesses of different sizes is reasonable throughout its AAs.
- The bank did not receive any CRA related complaints during the evaluation period.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD is reasonable.

As of December 31, 2019, BVNB's LTD ratio was 63.4 percent. The bank's average LTD ratio over the evaluation period of 15 quarters was 60.1 percent. Over the same evaluation period, the bank's LTD ratio ranged from a low of 50.9 percent to a high of 67.9 percent.

When evaluating the reasonableness of the bank's LTD ratio, we considered the impact of home mortgage loan originations sold by the bank to the secondary loan market. Throughout the evaluation period, the bank sold approximately one third of all home mortgage originations to the secondary loan market. Additionally, we analyzed the LTD ratio of five comparable institutions based on their size, location, and lending opportunities. These institutions ranged in size from \$53.7 million to \$205.9 million, with a combined average LTD ratio of 55.3 percent over the same evaluation period. The lowest individual average was 46.3 percent, while the highest individual average was 59.7 percent. The bank ranked highest out of the six when comparing the average LTD ratios. The table below lists the similarly situated institutions (including BVNB) and the corresponding average LTD ratios.

Institution	Total Assets (\$000s) as of 12/31/2019	Average Quarterly LTD Ratio
Buena Vista National Bank	\$212,348	60.1%
Chester National Bank	\$64,118	59.7%
North County Savings Bank	\$53,681	57.9%
The First National Bank of Sparta	\$82,050	57.3%
First National Bank of Steepleville	\$205,890	55.2%
The Gerber State Bank	\$75,845	46.3%
Source: Quarterly Call Reports from March 31, 2016 to December 31, 2019. Note: The LTD ratio was calculated and evaluated on a bank-wide basis.		

Lending in Assessment Area

The majority of the bank's loans are originated inside its AAs.

The bank originated 78.8 percent of its total loans by number and 68.7 percent by dollar inside its AAs during the evaluation period. This ratio is a bank-wide calculation, and not calculated by individual rating area or AA.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2017	170	82.9	35	17.1	205	13,721	73.5	4,948	26.5	18,669
2018	158	76.0	50	24.0	208	10,057	63.3	5,835	36.7	15,891
2019	178	76.7	54	23.3	232	16,266	68.3	7,556	31.7	23,822
Subtotal	506	78.4	139	21.6	645	40,044	68.6	18,339	31.4	58,382
Small Business										
2017	4	66.7	2	33.3	6	208	36.6	360	63.4	568
2018	7	100.0	0	0.0	7	429	100.0	0	0.0	429
2019	7	100.0	0	0.0	7	457	100.0	0	0.0	457
Subtotal	18	90.0	2	10.0	20	1,094	75.2	360	24.8	1,454
Consumer										
2017	1	50.0	1	50.0	2	51	82.3	11	17.7	62
2018	6	75.0	2	25.0	8	38	41.8	53	58.2	91
2019	9	90.0	1	10.0	10	46	79.3	12	20.7	58
Subtotal	16	80.0	4	20.0	20	135	64.0	76	36.0	211
Total	540	78.8	145	21.2	685	41,273	68.7	18,775	31.3	60,047
Source: Evaluation Period: 1/1/2017 - 12/31/2019 Bank Data Due to rounding, totals may not equal 100.0										

Description of Institution

BVNB is an intrastate bank headquartered in Chester, Illinois, and wholly owned by Buena Vista Bancorp, Inc. (BVBI), a one-bank holding company headquartered in Chester, Illinois. As of December 31, 2019, BVBI had total assets of approximately \$30.5 million. There were no affiliate or subsidiary activities considered in this evaluation.

The bank currently operates one main office and a separate limited-service facility in Chester, Illinois, as well as six other branches located across Randolph and Macon County, Illinois. In addition to the Chester locations, Randolph County branches include Red Bud (2), Evansville (1), and Prairie du Rocher (1). The two Macon County branches are located in Decatur and Warrensburg. The Macon County locations are over three hours driving distance from the Randolph County locations. The bank acquired the State Bank of Prairie du Rocher in 2012, which resulted in the acquisition of a branch at that location and in Red Bud. The bank acquired a second Red Bud location by purchasing a branch from Chester National Bank in 2013. The main office and each of the branch locations have a cash-dispensing automated teller machine (ATM) onsite. The bank did not open or close any new branches or engage in any acquisition or merger activities during the evaluation period.

As of December 31, 2019, the bank had total assets of \$212.3 million, total deposits of \$178.6 million, and Tier 1 Capital of \$25 million, or 16.8 percent of total risk weighted assets. The bank's gross loans and leases totaled \$114.3 million, representing 53.3 percent of total assets. Loan portfolio composition as of December 31, 2019, includes the following:

Loan Type	Dollars (000)	Percentage of Loan Portfolio
Residential Loans	\$50,354	44.1%
Commercial Loans	\$35,708	31.2%
Consumer Loans	\$14,166	12.4%
Agricultural Loans	\$12,613	11.0%
Other Loans	\$1,486	1.3%
Total Loans	\$114,327	100%
<i>Source: 12/31/2019 FFIEC Call Report</i>		

BVNB competes with many national banks, state banks, and credit unions for deposit market share. The bank offers a variety of deposit products to businesses and consumers. Deposit products consist of checking, savings, and money market deposit accounts, certificates of deposit, individual retirement accounts, and health savings accounts. The bank offers additional retail services including check cashing, direct deposit, online banking with bill payment and funds transfer, mobile banking, remote deposit capture, safe deposit box rentals and telephone banking.

Consumer loan products include home mortgages (conventional and Veterans Affairs loans), home equity lines of credit, personal loans, and automobile loans. Business/Agricultural loan products include term loans, lines of credit, and machinery/equipment loans.

In 2009, BVNB established the River City "Pride Fund." The fund remains active today and is exclusively available to local small business owners for the renovation and improvement of the outside appearance of their business establishments. The bank has committed a total of \$100,000 in available

loan funds, up to \$5,000 per small business owner, with zero interest and a term of two-years for repayment. BVNB extended several of these loans over the evaluation period (2017-2019).

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AAs. The bank's last CRA performance evaluation was on February 29, 2016. Utilizing Small Bank CRA examination procedures, the OCC concluded that the bank's performance was "Satisfactory."

For CRA purposes, the bank has identified two AAs. The first AA is in southwestern Illinois in a Non-Metropolitan Statistical Area (Non-MSA), which the bank refers to as the Illinois Non-MSA. The Illinois Non-MSA includes all of Randolph County. Management designated all of Macon County in central Illinois as the second AA. Macon County is the only county in the Decatur Metropolitan Statistical Area (MSA) # 19500. Both AAs conform to regulatory requirements and do not arbitrarily exclude any low- and moderate-income geographies. See the Description of Institution's Operations in Illinois section for further details.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The scope of this evaluation includes an assessment of the bank under the Small Bank performance criteria, which consists only of a Lending Test. The Lending Test evaluates the bank's record of meeting the credit needs of its AAs through its lending activities.

The evaluation period for this examination is from March 1, 2016 through December 31, 2019. For the Lending Test, we determined that the bank's loan data from January 1, 2017 through December 31, 2019 was representative of the evaluation period.

Based on discussions with bank management and our review of all loan originations and purchases from January 1, 2017 to December 31, 2019, we determined the bank's primary lending products are home mortgage loans and consumer loans for the Illinois Non-MSA, and home mortgage loans and business loans for the Decatur MSA. Please refer to the following tables for a summary of loan originations by loan type, for each of the AAs during the evaluation period:

Illinois Non-MSA Loan Originations by Loan Type from January 1, 2017 through December 31, 2019				
Loan Category	Number of Loans	% of Number of Loans	Dollars (000s)	% of Dollars
Consumer Loans	2,695	72.4%	\$22,884	19.0%
Home Mortgage Loans	538	14.4%	\$56,913	47.2%
Business Loans	278	7.5%	\$27,571	22.9%
Farm Loans	211	5.7%	\$13,112	10.9%
Total Originations	3,722	100%	\$120,480	100%
<i>Source: Bank Records January 1, 2017 – December 31, 2019</i>				

Decatur MSA Loan Originations by Loan Type from January 1, 2017 through December 31, 2019				
Loan Category	Number of Loans	% of Number of Loans	Dollars (000s)	% of Dollars
Business Loans	150	43.2%	\$6,803	49.6%
Consumer Loans	142	40.9%	\$1,539	11.2%
Home Mortgage Loans	52	15.0%	\$4,731	34.5%
Farm Loans	3	0.9%	\$646	4.7%
Total Originations	347	100%	\$13,719	100%
<i>Source: Bank Records January 1, 2017 – December 31, 2019</i>				

To evaluate lending performance, we reviewed the bank submitted Home Mortgage Disclosure Act (HMDA) data for each of the bank's AAs from 2017, 2018, and 2019. Additionally, we selected a random sample of consumer loans from the Illinois Non-MSA, and a random sample of business loans from the Decatur MSA. Sample sizes for both the consumer and business loans were identical (20 loans originated during the evaluation period of 2017-2019). Refer to the "Scope" section under State Rating for further details.

For our analysis of the bank's lending performance over the evaluation period of 2017-2019, we used the comparators of demographic data from the 2015 American Community Survey (ACS) Census and 2018 HMDA and CRA peer aggregate data.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to Appendix A, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is based solely on its performance in the state of Illinois. The state of Illinois rating is derived the bank's performance under the CRA Small Bank Lending Test, as well as related performance context information from the bank's Illinois Non-MSA and Decatur MSA.

With the exception of the bank's LTD ratio (based on the bank's entire lending portfolio), performance under the CRA Small Bank Lending Test was based on the bank's lending performance in relation to its primary products of home mortgage loans and consumer loans in the Illinois Non-MSA, and home mortgage loans and business loans in the Decatur MSA.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of Illinois

CRA rating for the State of Illinois¹: Satisfactory.

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- The bank's loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and level of local competition.
- The majority of the bank's loans are originated inside its AAs.
- The bank's distribution of loans across geographies of different income levels is excellent throughout its Decatur MSA AA.
- The bank's distribution of loans to individuals of different income levels and businesses of different sizes is reasonable throughout its AAs.
- The bank did not have any CRA related complaints during the evaluation period.

Description of Institution's Operations in Illinois

The bank operates a main office, a separate limited-service drive-up facility, and six branches across two AAs in the state of Illinois. Due to differences in the primary products in each AA, we chose different products for analysis in each AA. In the Illinois Non-MSA, we reviewed home mortgage and consumer loans, and in the Decatur MSA, we reviewed home mortgage and business loans.

Illinois Non-MSA

Management designated all of Randolph County in southwestern Illinois as one of its AAs. Based on 2015 Census data, Randolph County consists of eight (89 percent) middle-income and one (11 percent) upper-income geographies. There are no low- or moderate-income geographies within this AA.

Based on the FDIC Summary of Deposits Report as of June 30, 2019, BVNB reported 155.4 million in deposits in this AA, representing 90.6 percent of the bank's total deposits. The bank ranked second in deposit market share in the AA with a market share of 20 percent. Competition for financial services is strong, as eight other financial institutions, operating 15 branches, have a presence in the AA. Six competitors are local community banks, and two are large regional banks.

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

An analysis of HMDA peer mortgage data in the AA over the evaluation period² further demonstrates the strong level of competition faced by the bank. BVNB originated 268 home mortgage loans in the AA during 2017-2018 for an average market share of 23.7 percent. There were 92 other institutions that originated or purchased a total of 430 home mortgage loans in 2017, and 88 other institutions that originated or purchased 434 home mortgage loans in 2018.

Demographic Information of the Illinois Non-MSA Assessment Area for 2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	9	0.0	0.0	88.9	11.1	0.0
Population by Geography	33,069	0.0	0.0	85.0	15.0	0.0
Housing Units by Geography	13,762	0.0	0.0	85.4	14.6	0.0
Owner-Occupied Units by Geography	9,209	0.0	0.0	84.0	16.0	0.0
Occupied Rental Units by Geography	2,686	0.0	0.0	86.7	13.3	0.0
Vacant Units by Geography	1,867	0.0	0.0	90.7	9.3	0.0
Businesses by Geography	1,599	0.0	0.0	78.2	21.8	0.0
Farms by Geography	178	0.0	0.0	81.5	18.5	0.0
Family Distribution by Income Level	7,860	17.1	20.0	21.3	41.6	0.0
Household Distribution by Income Level	11,895	20.7	17.2	18.0	44.1	0.0
Median Family Income Non-MSAs - IL		\$59,323	Median Housing Value			\$99,673
			Median Gross Rent			\$624
			Families Below Poverty Level			7.2%
Source: 2015 ACS Census and 2019 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

Geographic Distribution of the Population

According to the 2015 ACS Census data, the area population was 33,069 with 28,095 (85 percent) residing in middle-income CTs, and 4,974 (15 percent) residing in upper-income CTs.

Family Distribution by Income Level

Based on the data found in the table below, the annual FFIEC adjusted median family income (MFI) increased by approximately 6.3 percent (\$3,800) between 2017 and 2019.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Illinois Non-MSA FFIEC Adjusted Median Family Income				
2017 (\$60,400)	<\$30,200	\$30,200 to <\$48,320	\$48,320 to <\$72,480	≥\$72,480
2018 (\$63,900)	<\$31,950	\$31,950 to <\$51,120	\$51,120 to <\$76,680	≥\$76,680
2019 (\$64,200)	<\$32,100	\$32,100 to <\$51,360	\$51,360 to <\$77,040	≥\$77,040
<i>Source FFIEC</i>				

² Based on HMDA loans originated by the bank and the aggregate peer, between January 1, 2017 and December 31, 2018; 2019 Peer Mortgage Data was not available at the time of this examination.

According to the 2015 ACS Census data, there were 7,860 families in the AA. The distribution of families by income level was 1,344 (17.1 percent) low-income, 1,572 (20 percent) moderate-income, 1,674 (21.3 percent) middle-income, and 3,270 (41.6 percent) upper-income. The percentage of families in the AA living below the poverty level was 7.2 percent.

Housing Characteristics and Home Affordability

The 2015 ACS US Census reported total housing units of 13,762 in the AA. Of the total number of housing units, 9,209 or 66.9 percent were owner-occupied, 2,686 or 19.5 percent were renter-occupied, and 1,867 or 13.6 percent were vacant. There were no housing units located in low-income or moderate income (LMI) CTs. The weighted average median housing value for the AA was approximately 3.1 times the income of low-income borrowers and 2.4 times the income of moderate-income borrowers. The median age of housing stock in the AA was 53 years. Older homes often cost more to maintain, frequently require significant repairs to meet building code requirements, and are typically less energy efficient. All of these factors add to the overall cost of homeownership and in turn, can have a negative impact on home affordability for LMI individuals.

One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Assuming a 30-year mortgage with a 5 percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$32,100 per year (or less than 50 percent of the 2019 FFIEC adjusted MFI in the AA) could afford a \$149,491 mortgage with a payment of \$803 per month. A moderate-income borrower making \$51,360 per year (or less than 80 percent of the 2019 FFIEC adjusted MFI in the AA) could afford a \$239,186 mortgage with a payment of \$1,284 per month. This illustrates that low- and moderate-income borrowers could qualify for a mortgage loan based on the median housing value in the AA with an estimated monthly payment of \$591. According to Realtor.com data, the median housing value in the AA ranged from a low of \$72,500 in 2017 to a high of \$110,000 in 2019.

Employment Factors

According to the U.S. Bureau of Labor Statistics (BLS) data, the unemployment rate in Randolph County ranged from a high of 4.5 percent in 2017 to a low of 3.9 percent in 2019. The unemployment rate for the state of Illinois ranged from a high of 4.9 percent in 2017 to a low of 4.0 percent in 2019, lagging behind the national unemployment rate over the same period.

Annual Unemployment Rates 2017-2019			
Area	2017	2018	2019
Randolph County	4.5%	4.4%	3.9%
State of Illinois	4.9%	4.3%	4.0%
National	4.4%	3.9%	3.7%

Source: U.S. Department of Labor; Bureau of Labor Statistics. Rates are not seasonally adjusted.

Economic Conditions

According to Moody's Analytics, Illinois' expansion is holding up well for a state facing a slowdown in manufacturing, poor agricultural conditions, and myriad demographic and fiscal problems. Already hovering around its historical low for more than a year, the unemployment rate dipped to 3.7% in September despite an uptick in the labor force. IL will be hard-pressed to match the U.S. pace of growth in any industry, but prospects are strongest in office-using industries and healthcare. Now that global economic growth has slowed, softer overseas demand for everything from farm products to transportation equipment will weigh on industrial production and reduce the need for more factory labor. Places in IL that rely on exports to China, particularly crops and livestock, have suffered from the trade war. But if the threatened tariffs on virtually all Chinese imports are implemented, the pain will extend more broadly to larger gateway metro areas such as Chicago. While every part of the country buys goods made in China, IL's large logistics presence puts it in an especially vulnerable position.

The largest industries in Randolph County are Manufacturing, Health Care & Social Assistance, and Retail Trade. The top employers in the AA include, State of Illinois (Menard Correctional Facility and Chester Mental Health Center), Gilster Mary Lee Corporation, Dynergy, Knight Hawk Coal, and Spartan Light Metals.

Community Contacts

We contacted a representative from a local economic development/community organization to identify credit and other needs within the AA. The contact noted Randolph County is stable. The contact indicated most needs are met, but people could benefit from rental, utility, and food assistance.

Decatur MSA

Management designated all of Macon County in central Illinois as the second AA. Macon County is the only county in the Decatur Metropolitan Statistical Area (MSA) # 19500. This AA is comprised of 34 CTs; there are eight (24 percent) low-income, five (15 percent) moderate-income, 11 (32 percent) middle-income, and 10 (29 percent) upper-income geographies within the AA. The low-income geographies are in downtown Decatur, four miles from BVNB's closest branch office at the northern edge of the city.

Based on the FDIC Summary of Deposits Report as of June 30, 2019, BVNB reported \$16.2 million in deposits in this AA, representing 9.5 percent of the bank's total deposits. The bank ranked 12th in deposit market share in the AA with a market share of approximately 0.9 percent. Competition for financial services is strong, as 12 other financial institutions, operating 37 offices, have a presence in the AA. Competitors range from small community banks to large banks with a nationwide presence.

An analysis of HMDA peer mortgage data in the AA over the evaluation period³ further demonstrates the significant level of competition faced by the bank. BVNB originated 60 home mortgage loans in the AA during 2017-2018 for an average market share of 1.3 percent. There were 145 other institutions that

³ Based on HMDA loans originated by the bank and the aggregate peer, between January 1, 2017 and December 31, 2018; 2019 Peer Mortgage Data was not available at the time of this exam.

originated or purchased a total of 2,415 home mortgage loans in 2017, and 150 other institutions that originated or purchased 2,264 home mortgage loans in 2018.

Demographic Information of the Decatur MSA Assessment Area for 2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	34	23.5	14.7	32.4	29.4	0.0
Population by Geography	109,193	18.5	11.6	34.5	35.4	0.0
Housing Units by Geography	50,391	20.4	12.5	33.3	33.8	0.0
Owner-Occupied Units by Geography	30,995	9.4	9.5	37.9	43.2	0.0
Occupied Rental Units by Geography	13,920	39.5	16.0	26.3	18.1	0.0
Vacant Units by Geography	5,476	33.9	20.7	25.3	20.0	0.0
Businesses by Geography	5,265	28.9	11.4	27.0	32.7	0.0
Farms by Geography	293	7.2	2.7	45.7	44.4	0.0
Family Distribution by Income Level	27,658	22.9	16.9	20.1	40.1	0.0
Household Distribution by Income Level	44,915	25.4	15.2	17.1	42.2	0.0
Median Family Income MSA - 19500 Decatur, IL MSA		\$60,745	Median Housing Value			\$89,013
			Median Gross Rent			\$646
			Families Below Poverty Level			13.6%
Source: 2015 ACS Census and 2019 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

Geographic Distribution of the Population

According to the 2015 ACS Census data, the area population was 109,193 with 20,244 (18.5 percent) residing in low-income CTs, 12,697 (11.6 percent) residing in moderate-income CTs, 37,629 (34.5 percent) residing in middle-income CTs, and 38,623 (35.4 percent) residing in upper-income CTs.

Family Distribution by Income Level

Based on the data found in the table below, the annual FFIEC adjusted MFI decreased by approximately 0.15 percent (\$100) between 2017 and 2019.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Decatur MSA FFIEC Adjusted Median Family Income				
2017 (\$67,000)	<\$33,500	\$33,500 to <\$53,600	\$53,600 to <\$80,400	≥\$80,400
2018 (\$66,700)	<\$33,350	\$33,350 to <\$53,360	\$53,360 to <\$80,040	≥\$80,040
2019 (\$66,900)	<\$33,450	\$33,450 to <\$53,520	\$53,520 to <\$80,280	≥\$80,280
<i>Source FFIEC</i>				

According to the 2015 ACS Census data, there were 27,658 families in the AA. The distribution of families by income level was 6,334 (22.9 percent) low-income, 4,672 (16.0 percent) moderate-income, 5,559 (20.1 percent) middle-income, and 11,091 (40.1 percent) upper-income. The percentage of families in the AA living below the poverty level was 13.6 percent.

Housing Characteristics and Home Affordability

The 2015 ACS Census reported total housing units of 50,391 in the AA. Of the total number of housing units, 30,995 or 61.5 percent were owner-occupied, 13,920 or 27.6 percent were renter-occupied, and 5,476 or 10.9 percent were vacant. Of all owner-occupied units, 2,914 (9.4 percent) were located in low-income CTs and 2,945 (9.5 percent) were located in moderate-income CTs. For occupied rental units, 5,498 (39.5 percent) were located in low-income CTs and 2,227 (16 percent) were located in moderate-income CTs, and for vacant units, 1,856 (33.9 percent) were located in low-income CTs, and 1,134 (20.7 percent) were located in moderate-income CTs. Additionally, 5,249 (12.4 percent) of all single family (1-4 units) homes and 1,051 (15.9 percent) of all multifamily housing units were in moderate-income CTs. The weighted average median housing value was approximately 2.7 times the income of low-income borrowers and 1.7 times the income of moderate-income borrowers. The median age of housing stock in the moderate-income CTs of the AA increased to 68 years, while the overall median age remained at 58 years.

One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Assuming a 30-year mortgage with a 5 percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$33,450 per year (or less than 50 percent of the 2019 FFIEC adjusted MFI in the AA) could afford a \$155,758 mortgage with a payment of \$836 per month. A moderate-income borrower making \$53,520 per year (or less than 80 percent of the 2019 FFIEC adjusted MFI in the AA) could afford a \$249,230 mortgage with a payment of \$1,338 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan based on the median housing value in the AA with an estimated payment of \$1,073. According to Realtor.com data, the median housing value in the AA ranged from a low of \$74,900 in 2017 to a high of \$94,900 in 2019, an increase of 26.7 percent.

Employment Factors

According to the U.S. Bureau of Labor Statistics (BLS) data, the annual unemployment rate in Macon County ranged from a high of 5.6 percent in 2017 to a low of 5.3 percent in 2019. The annual unemployment rate for the state of Illinois ranged from a high of 4.9 percent in 2017 to a low of 4.0 percent in 2019, lagging behind the national unemployment rate over the same period.

Annual Unemployment Rates 2017-2019			
Area	2017	2018	2019
Macon County	5.6%	5.6%	5.3%
State of Illinois	4.9%	4.3%	4.0%
National	4.4%	3.9%	3.7%

Source: U.S. Department of Labor; Bureau of Labor Statistics. Rates are not seasonally adjusted.

Economic Conditions

According to Moody's Analytics, Decatur's economy is showing some signs of strength. Job growth has steadily improved through the first three quarters of 2019. Manufacturing and leisure/hospitality have led gains while such industries as business/professional services and retail have stabilized after incurring losses in 2018. Factory hiring has picked up even though estimated industrial production has trended downward, as U.S. mining production has slumped, and soybean processing has cooled off due to trade tensions. The jobless rate is at a cycle low of 5% and average hourly earnings growth is among the highest in the region despite a growing labor force. Home sales and price growth are falling, however, as the population continues to plummet.

The top five employment sectors in the AA are Manufacturing, Education and Health Services, Government, Retail Trade, and Leisure and Hospitality Services. The top employers in the AA include Archer Daniels Midland Co., Decatur Memorial Hospital, Caterpillar Inc., St. Mary's Hospital, Tate Lyle Inc., and Ameren.

Community Contacts

We contacted a representative from a local economic development/community organization to identify credit and other needs within the AA. The contact noted the Decatur MSA/Macon County is stable. The contact indicated local people could benefit more from rental, utility, and food assistance.

Scope of Evaluation in Illinois

We conducted full-scope reviews for both the Illinois Non-MSA and the Decatur MSA. Greater weight was placed on the Illinois Non-MSA, where the majority of the bank's deposits (90.6 percent) and loan originations (91.5 percent) were located during the evaluation period. Primary products reviewed for the Lending Test were home mortgage loans in the Illinois Non-MSA and the Decatur MSA, business loans in the Decatur MSA only, and consumer loans in the Illinois Non-MSA only.

Refer to Appendix A for more information.

LENDING TEST

The bank's performance under the Lending Test in Illinois is rated Satisfactory.

Based on full-scope reviews, the bank's performance in the Illinois Non-MSA is good and the bank's performance in the Decatur MSA is excellent.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in the state. Our analysis is based only on the bank's performance in the Decatur MSA. Analysis of the Illinois Non-MSA would not be meaningful as there are no low- or moderate-income CTs in the AA.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans throughout the Decatur MSA is excellent.

Refer to Table O in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Decatur MSA

The bank's distribution of home mortgage loans reflects excellent dispersion. The bank's percentage of home mortgage loans in low-income CTs (10.2 percent) exceeded both the percentage of owner-occupied housing units in low-income CTs (9.4 percent) and the aggregate percentage of loans originated within those geographies (5.0). The bank's percentage of home mortgage loans in moderate-income CTs (16.3 percent) significantly exceeded both the percentage of owner-occupied housing units in moderate-income CTs (9.5 percent) and the aggregate percentage of loans originated and purchased in those geographies (5.6 percent).

Small Loans to Businesses

The bank exhibits an excellent geographic distribution of small loans to businesses within the Decatur MSA.

Refer to Table Q in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Decatur MSA

When considering the bank's minimal deposit market share and the strong level of lending competition in the AA, the bank's geographic distribution of small loans to businesses is excellent.

The bank's percentage of loans (25 percent) in low-income CTs is near the percentage of businesses in low-income CTs (28.9 percent) but below the aggregate percentage of loans originated in the AA (35.2 percent). However, in moderate-income CTs the bank's percentage of loans (20 percent) significantly exceeds both the percentage of businesses located in moderate-income CTs (11.4 percent) and the aggregate percentage of loans originated and purchased in the AA (8.5 percent).

Lending Gap Analysis

We reviewed summary reports and maps, and analyzed the bank's home mortgage, business, and consumer lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

The distribution of home mortgage loans reflects reasonable penetration among borrowers of different income levels in the AAs. In evaluating the borrower distribution of home mortgage loans, we considered several factors discussed under the Description of Operations in Illinois section above, including the percentage of families living at or below the poverty level, the median housing value in relation to low- and moderate-income levels, the median age of housing stock in the low- and moderate-income CTs, the percentage of rental units in relation to owner-occupied units within the low- and moderate-income CTs, and the strong level of competition faced by the bank. All these factors impacted the bank's ability to lend to low- and moderate-income families.

Refer to Table P in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Illinois Non-MSA

In addition to the factors noted above, we also considered that CTs in the AA with the largest populations of low- and moderate-income persons also exhibit the highest level of competition, most prominently from other community banks with branch locations actually within those same CTs. There are five institutions operating a total of six branches in the CTs, while BVNB does not have a physical branch location in these same CTs. This represents another obstacle to the bank's ability to fully reach the low- and moderate-income populations of the entire AA.

The overall distribution of home mortgage loans to borrowers of different income levels in the Illinois Non-MSA is reasonable. The bank's percentage of home mortgage loans to low-income borrowers (4.4 percent) was well below the percentage of low-income families (17.1 percent) but within a reasonable range below the aggregate lending to low-income borrowers (7.7 percent) in the AA. The bank's percentage of home mortgage loans to moderate-income borrowers (16.7 percent) was within a reasonable range to both the percentage of moderate-income families (20 percent) and the percentage of aggregate lending to moderate-income borrowers (19.4 percent) in the AA.

Decatur MSA

The overall distribution of home mortgage loans to borrowers of different income levels in the Decatur MSA is reasonable. The bank's percentage of home mortgage loans to low-income borrowers (11.2 percent) was below the percentage of low-income families (22.9 percent) but in line with the aggregate lending to low-income borrowers (11.7 percent) in the AA. The bank's percentage of home mortgage loans to moderate-income borrowers (22.4 percent) exceeds both the percentage of moderate-income families (16.9 percent) and the percentage of aggregate lending to moderate-income borrowers (22.1 percent) in the AA.

Small Loans to Businesses

The bank exhibits an excellent distribution of loans to businesses of different sizes in the Decatur MSA.

Refer to Table R in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Decatur MSA

The bank's percentage of loans to small businesses (90 percent) exceeds the percentage of small businesses (75.1 percent) in the AA and significantly exceeds the percentage of aggregate lending to small businesses (42.3 percent).

Consumer Loans

The bank exhibits an excellent distribution of consumer loans to borrowers of different income levels in the Illinois Non-MSA.

Refer to Table V in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of consumer loans.

Illinois Non-MSA

The bank's percentage of consumer loans to low-income borrowers (25 percent) exceeds the percentage of low-income households (20.7 percent) in the AA. The bank's percentage of consumer loans to moderate-income borrowers (35 percent) significantly exceeds the percentage of moderate-income households (17.2 percent) in the AA.

Responses to Complaints

The bank did not receive any written complaints regarding its CRA performance during the evaluation period.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Lending Test		
Time Period Reviewed:	01/01/17 to 12/31/19	
Bank Products Reviewed:	Home Mortgage Loans, Business Loans, Consumer Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not Applicable	Not Applicable	Not Applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Illinois		
Decatur MSA	Full-scope	Macon County: CTs 0002.00 – 0006.00, 0009.00 – 0017.00, 0018.01, 0018.02, 0019.00 – 0023.00, 0024.01, 0024.02, 0025.00, 0026.01, 0026.02, 0027.00, 0028.00, 0029.01 – 0029.04, 0030.00, 0031.00
Illinois Non-MSA	Full-scope	Randolph County: CTs 9505.00 – 9513.00

Appendix B: Summary of MMSA and State Ratings

RATINGS: BUENA VISTA NATIONAL BANK	
Overall Bank:	Lending Test Rating:
Buena Vista National Bank	Satisfactory
State:	
Illinois	Satisfactory

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rating Area: A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal

to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -**
Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography -** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower -** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-19
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Illinois Non-MSA	408	34,650	80.6	557	0.0	0.0	0.0	0.0	0.0	0.0	84.0	81.1	77.0	16.0	18.9	23.0	0.0	0.0	0.0
Decatur MSA	98	5,394	19.4	2,299	9.4	10.2	5.0	9.5	16.3	5.6	37.9	36.7	36.5	43.2	36.7	52.9	0.0	0.0	0.0
Total	506	40,044	100.0	2,856	7.2	2.0	4.0	7.4	3.2	4.5	48.4	72.5	44.4	37.0	22.3	47.1	0.0	0.0	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-19
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Illinois Non-MSA	408	34,650	80.6	557	17.1	4.4	7.7	20.0	16.7	19.4	21.3	25.2	24.2	41.6	50.7	36.1	0.0	2.9	12.6
Decatur MSA	98	5,394	19.4	2,299	22.9	11.2	11.7	16.9	22.4	22.1	20.1	19.4	22.2	40.1	42.9	28.1	0.0	4.1	15.9
Total	506	40,044	100.0	2,856	21.6	5.7	11.0	17.6	17.8	21.6	20.4	24.1	22.6	40.4	49.2	29.6	0.0	3.2	15.3
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-19**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Decatur MSA	20	1,158	100.0	1,041	28.9	25.0	35.2	11.4	20.0	8.5	27.0	25.0	25.9	32.7	30.0	30.5	0.0	0.0	0.0
Total	20	1,158	100.0	1,041	28.9	25.0	35.2	11.4	20.0	8.5	27.0	25.0	25.9	32.7	30.0	30.5	0.0	0.0	0.0

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-19**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Decatur MSA	20	1,158	100.0	1,041	75.1	90.0	42.3	6.8	18.2	18.1	0.0
Total	20	1,158	100.0	1,041	75.1	90.0	42.3	6.8	18.2	18.1	0.0

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2017-19
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Illinois Non-MSA	20	165	100.0	0.0	0.0	0.0	0.0	84.6	75.0	15.4	25.0	0.0	0.0
Total	20	165	100.0	0.0	0.0	0.0	0.0	84.6	75.0	15.4	25.0	0.0	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data. Due to rounding, totals may not equal 100.0													

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2017-19
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Illinois Non-MSA	20	165	100.0	20.7	25.0	17.2	35.0	18.0	25.0	44.1	15.0	0.0	0.0
Total	20	165	100.0	20.7	25.0	17.2	35.0	18.0	25.0	44.1	15.0	0.0	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data. Due to rounding, totals may not equal 100.0													